

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25

2  
3  
4  
5  
6  
7

8  
9

10  
11  
12  
13  
14  
15

## 16

17  
18  
19  
20  
21  
22

23

24

25

1 claim 70 depends. As such, Applicant requests withdrawal of the rejection of  
2 claim 70.

3 Claim 74 has been amended to provide proper antecedent basis for various  
4 limitations by reciting “the sharp edges and the silhouette edges” in lines 20, 21,  
5 and 22 of the original application. Claim 74 is believed to be allowable.

6 **Claim Rejections – 35 U.S.C. § 102**

7 Claims 1-4, 6-13, 15-20, 43-47, 53-64, 66, 68-69, and 71-74 stand rejected  
8 under 35 U.S.C. 102(e) as being purportedly anticipated by U.S. Patent No.  
9 6,115,050 to Landau et al. (“Landau”). The Applicant respectfully traverses this  
10 rejection.

11 Landau discloses a graphics rendering system that creates an image based  
12 on objects constructed of polygonal primitives. “High speed rendering systems  
13 typically rely on combinations of simple polygons, referred to as primitives, to  
14 build more complex objects.” Landau, col. 1, lines 33-35. Silhouette edges in the  
15 image are anti-aliased by creating anti-aliasing polygonal primitives which vary in  
16 opacity. Landau, Abstract. Such anti-aliasing primitives are shown as  
17 triangles 150 in FIG. 14 of Landau. These anti-aliasing primitives are joined to  
18 the silhouette edges in the image and create a region in the image where objects  
19 appear to blend into the background. Landau, Abstract.

20 The systems and techniques disclosed and suggested in Landau fail to  
21 anticipate the recited invention. The operation of “overdrawing” is clearly  
22 described in the application. For example, the “overdrawn edges are effectively  
23 superimposed on the rendered image in the frame buffer 208”. Page. 11, lines 7-8.  
24 Furthermore, various implementations of an overdraw method are described from  
25 page 11, line 16 to page 20, line 23.

1 Claim 1 recites “overdrawing the discontinuity edges as antialiased lines”.  
2 Landau only discloses creating anti-aliasing polygonal primitives, not lines. The  
3 Cambridge International Dictionary of English (Online) defines a “polygon” to be  
4 “a flat shape with three or more straight sides” (giving triangles and squares as  
5 examples), which clearly does not include lines.  
6 <http://dictionary.cambridge.org/define.asp?key=61355&dict=CALD>.

7 Furthermore, Landau absolutely fails to disclose or suggest that a polygon might  
8 be anything other than a flat shape within three or more straight lines, providing a  
9 triangle as the only example of a polygonal primitive. Landau, col. 1, lines 37-39  
10 and FIG. 1. Accordingly, Landau fails to disclose or teach the “antialiased lines”  
11 feature of claim 1.

12 In addition, Landau fails to disclose or teach “overdrawing” discontinuity  
13 edges as anti-aliased lines. Instead, Landau discloses only joining polygonal  
14 primitives to a silhouette edge to anti-alias the silhouette edge. This can be seen in  
15 FIG. 14, in which triangles 150 are joined to one edge of the triangle 108. Having  
16 defined these triangles 150, Landau discloses only calculating and setting colors  
17 for pixels in each of the triangles 150 and does not disclose or suggest  
18 overdrawing the rendered discontinuity lines of the polygon as antialiased lines.  
19 That is, Landau’s silhouette edges are not overdrawn, but are supplemented by  
20 newly color-calculated pixels in newly created polygonal primitives located  
21 outside and adjacent to the triangle 108.

22 For the foregoing reasons, claim 1 is believed to be allowable over Landau.  
23 Withdrawal of the rejection is respectfully requested.

24 Claims 2-4 and 6-11 depend from claim 1, which is believed to be  
25 allowable. Therefore, claims 2-4 and 6-11 are believed to be allowable for at least

1 the same reasons as claim 1. Withdrawal of the rejection of claims 2-4 and 6-11 is  
2 respectfully requested.

3 Claim 12 also recites “overdrawing the discontinuity edges as antialiased  
4 lines”, just as claim 1 does, and claims 13 and 15-20 depend from claim 12.  
5 Therefore, claims 12-13 and 15-20 are believed to be allowable for at least the  
6 same reasons as claim 1. Withdrawal of the rejection of claims 12-13 and 15-20 is  
7 respectfully requested.

8 Claim 43 recites “overdrawing the silhouette edges as antialiased lines”, in  
9 a manner similar to claim 1, and claims 44-47 depend from claim 43. Therefore,  
10 claims 43-47 are believed to be allowable for at least the same reasons as claim 1.  
11 Withdrawal of the rejection of claims 43-47 is respectfully requested.

12 Claim 53 recites “overdrawing discontinuity edges of the polygonal mesh  
13 as antialiased lines”, in a manner similar to claim 1, and claims 54-62 depend from  
14 claim 53. Therefore, claims 53-62 are believed to be allowable for at least the  
15 same reasons as claim 1. Withdrawal of the rejection of claims 53-62 is  
16 respectfully requested.

17 Claim 63 recites “an overdrawer configured to overdraw the discontinuity  
18 edges as antialiased lines”, in a manner similar to claim 1, and claims 64, 66, and  
19 68 depend from claim 63. Therefore, claims 63-64, 66, and 68 are believed to be  
20 allowable for at least the same reasons as claim 1. Withdrawal of the rejection of  
21 claims 63-64, 66, and 68 is respectfully requested.

22 Claim 69 recites a graphical computing device to “overdraw the  
23 discontinuity edges as antialiased lines”, in a manner similar to claim 1, and  
24 claims 71-73 depend from claim 69. Therefore, claims 69 and 71-73 are believed  
25

1 to be allowable for at least the same reasons as claim 1. Withdrawal of the  
2 rejection of claims 69 and 71-73 is respectfully requested.

3 Claim 74, as amended, recites "means for overdrawing the sharp edges and  
4 the silhouette edges as antialiased lines", in a manner similar to claim 1.  
5 Therefore, claim 74 are believed to be allowable for at least the same reasons as  
6 claim 1. Withdrawal of the rejection of claims 74 is respectfully requested.

7 **Claim Rejections – 35 U.S.C. § 103**

8 Claims 5, 14, 21-42, 48-50, 52, 65, 67, and 70 stand rejected under 35  
9 U.S.C. § 103(a) as being purportedly unpatentable over Landau. Claims 28 and 42  
10 have been amended to correct typographical errors.

11 The Applicant asserts that Landau is disqualified as Section 103 prior art  
12 against the subject invention because the subject matter of Landau and the  
13 invention recited in claims 5, 14, 21-42, 48-50, 52, 65, 67, and 70 "were"  
14 commonly owned at the time the invention was made. Therefore, the Applicant  
15 traverses the rejection.

16 The entire rights in the subject matter of the Landau patent were originally  
17 assigned to WebTV Networks, Inc. Additionally, WebTV Networks, Inc. was  
18 acquired as a wholly owned subsidiary of the Microsoft Corporation in July  
19 of 1997. The subject application was filed on May 8, 2001, after the Microsoft  
20 Corporation acquired WebTV Networks, Inc. Therefore, the Applicant represents  
21 the following:  
22  
23  
24  
25

## STATEMENT OF COMMON OWNERSHIP

The subject application and the subject matter of the Landau patent were, at the time the invention of the subject application was made, owned by Microsoft Corporation.

Accordingly, Landau is disqualified as prior art against the claimed invention pursuant to 35 U.S.C. §103(c) via 35 U.S.C. §102(e). Therefore, claims 5, 14, 21-42, 48-50, 52, 65, 67, and 70 are therefore allowable and withdrawal of the rejection is respectfully requested.

### **Allowable Subject Matter**

It has been indicated that claim 51 would be allowable if written in independent form to include all of the limitations of the base claim and any intervening claims. However, claim 51 depends from claim 48 is believe to be allowable in light of the disqualification of the Landau reference as Section 103 prior art. Therefore, claim 51 is allowable, and withdrawal of the rejection is respectfully requested.

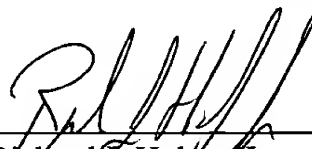
Conclusion

The Applicant respectfully requests that a timely Notice of Allowance be issued in this matter.

Respectfully Submitted,

Dated: 7-24-03

By: \_\_\_\_\_

  
Richard J. Holzer, Jr.  
Reg. No. 42,668  
(509) 324-9256